

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Baltimore Division)

In re:

ROMAN CATHOLIC ARCHBISHOP  
OF BALTIMORE

Debtor

\*

\*

\*

\*

Case No: 23-16969-MMH  
(Chapter 11)

\* \* \* \* \*

STIPULATION EXTENDING TIME TO RESPOND TO FIRST-DAY MOTIONS

The Roman Catholic Archbishop of Baltimore, the debtor and debtor-in-possession herein (the “Debtor”), and Eva Dittrich and other survivors similarly represented (collectively, the “Survivors”), by their respective counsel, file this Stipulation Extending Time to Respond to First-Day Motions, and hereby stipulate and agree as follows:

WHEREAS, on September 29, 2023, the Debtor filed the following motions (collectively, the “First-Day Motions”):

1. Debtor’s Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtor’s Proposed Form of Adequate Assurance of Payment to Utility Companies under Section 366 of the Bankruptcy Code, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [Dkt. # 8];
2. Debtor’s Emergency Application for Order (I) Authorizing and Approving the Appointment of Epiq Corporate Restructuring, LLC as Claims and Noticing Agent; and (II) Granting Related Relief [Dkt. # 11];
3. Debtor’s Emergency Motion for an Order Authorizing the Debtor to File under Seal Portions of Schedule E/F, the Creditor Matrix, and Other Pleadings and Documents [Dkt. # 2];
4. Debtor’s Emergency Motion for Entry of Interim and Final Orders Authorizing the Debtor to (I) Continue Administration of Insurance Programs, (II) Continue Participation in Insurance Programs, and (III) Renew, Amend, Supplement, Extend, or Purchase Insurance Coverage [Dkt. # 10];
5. Debtor’s Emergency Motion for Entry of Interim and Final Orders: (I) Authorizing the Debtor to (A) Pay Certain

Prepetition Wages, Benefits, and Other Compensation and (B) Continue Employee Compensation and Benefits Programs; and (II) Granting Related Relief [Dkt. # 7];

6. Debtor's Emergency Motion for Entry of Interim and Final Orders: (I) Authorizing Continued Use of Existing Cash Management System and Bank Accounts; (II) Extending the Time to Comply With, or Seek a Waiver of, Certain United States Trustee Requirements and Section 345(b) of the Bankruptcy Code; (III) Authorizing the Debtor to Continue Existing Deposit Practices; (IV) Authorizing the Debtor to Maintain Investment Practices; (V) Authorizing the Debtor's Continued Use of Credit Cards; and (VI) Granting Related Relief [Dkt. # 15];
7. Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Use of Cash Collateral and Granting Adequate Protection, (II) Scheduling a Final Hearing on the Use of Cash Collateral, and (III) Granting Related Relief [Dkt. # 9]; and
8. Debtor's Motion for Entry of an Order, Pursuant to Sections 105(a) and 362 of the Bankruptcy Code, Extending the Automatic Stay [Dkt. # 12].

WHEREAS, pursuant to the Notice of Final Hearing on Debtor's First-Day Motions and Objection Deadline [Dkt. # 53], the deadline to file any objections or other responses to any of the First-Day Motions is October 25, 2023;

WHEREAS, the Debtor has agreed that the deadline by which the Survivors represented by the law firms of Grant & Eisenhofer, P.A., Jenner Law, P.C. and Baird Mandalas Brockstedt & Federico, LLC may file a response to the First-Day Motions prior to the entry of final orders shall be extended through and including October 30, 2023; and

WHEREAS, the Debtor has agreed that the deadline by which any Official Committee of Unsecured Creditors appointed in the above-captioned case may file a response to the First-Day Motions prior to the entry of final orders shall be extended through and including October 30, 2023.

NOW, THEREFORE, it is hereby stipulated by the Debtor and the Survivors that the Survivors, as well as any Official Committee of Unsecured Creditors appointed in the above-captioned case, shall have through and including Monday, October 30, 2023 to respond to the First-Day Motions prior to the entry of final orders.

/s/ Catherine Keller Hopkin

Catherine Keller Hopkin, 28257  
Corinne Donohue Adams, 18768  
YVS Law, LLC  
185 Admiral Cochrane Drive, Suite 130  
Annapolis, Maryland 21401  
(443) 569-0788  
chopkin@yvslaw.com

Blake D. Roth (admitted *pro hac vice*)  
C. Scott Kunde (admitted *pro hac vice*)  
Tyler N. Layne (admitted *pro hac vice*)  
Holland & Knight LLP  
511 Union Street, Suite 2700  
Nashville, Tennessee 37219  
(615) 244-6380  
blake.roth@hklaw.com

Nicholas R. Miller (admitted *pro hac vice*)  
Holland & Knight LLP  
100 Congress Avenue, Suite 1800  
Austin, Texas 78701  
(512) 685-6457  
nick.miller@hklaw.com

Philip T. Evans, 11796  
Holland & Knight LLP  
800 17th Street, NW, Suite 1100  
Washington, D.C. 20006  
(202) 457-7043  
philip.evans@hklaw.com

Counsel for Debtor

/s/ Steven J. Kelly

Steven J. Kelly, 27386  
Suzanne Sangree, 26130  
Grant & Eisenhofer, P.A.  
3600 Clipper Mill Road, Suite 240  
Baltimore, Maryland 21211  
(443) 531-1474  
skelly@gelaw.com

Gordon Z. Novod (admitted *pro hac vice*)  
Grant & Eisenhofer, P.A.  
485 Lexington Avenue, 29th Floor  
New York, New York 10017  
(646) 722-8523  
gnovod@gelaw.com

Robert K. Jenner, 04165  
Kathleen R. Kerner, 18955  
Elisha Hawk, 29169  
Jenner Law, P.C.  
3600 Clipper Mill Road, Suite 240  
Baltimore, Maryland 21211  
(410) 413-2155  
rjenner@jennerlawfirm.com

Philip C. Federico, 01216  
Brent P. Ceryes, 19192  
Wray Fitch, 19722  
Baird Mandalas Brockstedt & Federico, LLC  
2850 Quarry Lake Drive Suite 220  
Baltimore, Maryland 21209  
(410) 421-7777  
pfederico@bmbfclaw.com

Counsel for Eva Dittrich and Other Survivors

I HEREBY CERTIFY that the terms of the copy of the stipulation submitted to the Court are identical to those set forth in the original stipulation; and the signatures represented by the /s/ on this copy reference the signatures of consenting parties on the original stipulation.

/s/ Catherine Keller Hopkin

Catherine Keller Hopkin

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of October 2023, notice of filing the Stipulation Extending Time to Respond to First-Day Motions (the “Stipulation”) was served by CM/ECF to those parties listed on the docket as being entitled to such electronic notices, which parties are identified on the attached service list. In addition, Epiq Corporate Restructuring, LLC will cause a true and correct copy of the Stipulation to be served on all parties required to be served, with a certificate or affidavit of service to be filed subsequently, all in accordance with Local Rule 9013-4.

/s/ Catherine Keller Hopkin  
Catherine Keller Hopkin

The following parties received  
CM/ECF notice of the filing:

Hugh M. Bernstein, Esquire  
(hugh.m.bernstein@usdoj.gov)  
Office of the U.S. Trustee  
101 West Lombard Street, Suite 2625  
Baltimore, Maryland 21201

Catherine Keller Hopkin, Esquire  
(chopkin@yvslaw.com)  
Local Counsel for Debtor  
YVS Law, LLC  
185 Admiral Cochrane Drive, Suite 130  
Annapolis, Maryland 21401

James P. Ruggeri, Esquire  
(jruggeri@ruggierilaw.com)  
Counsel for Hartford and Twin City  
Ruggeri Parks Weinberg LLP  
1875 K Street NW, Suite 600  
Washington, D.C. 20006

Philip Tucker Evans, Esquire  
(philip.evans@hklaw.com)  
Counsel for Debtor  
Holland and Knight  
800 17th Street, Ste. 1100  
Washington, D.C. 20006

Steven J. Kelly, Esquire  
(skelly@gelaw.com)  
Counsel for Eva Dittrich  
Grant & Eisenhofer P.A.  
3600 Clipper Mill Road, Suite 240  
Baltimore, Maryland 21211

U.S. Trustee – Baltimore  
(ustpregion04.ba.ecf@usdoj.gov)  
101 West Lombard Street, Suite 2625  
Baltimore, Maryland 21201

Geoffrey Grivner, Esquire  
(geoffrey.grivner@bipc.com)  
Counsel for PNC Bank, N.A.  
Buchanan Ingersoll & Rooney PC  
500 Delaware Avenue, Suite 720  
Wilmington, Delaware 19801

Blake D. Roth, Esquire  
(blake.roth@hklaw.com)  
Counsel for Debtor  
Holland & Knight LLP  
511 Union Street, Suite 2700  
Nashville, Tennessee 37219